

EXHIBIT A

From: [Shannon Gustafson](#)
To: [Hang Le](#); [Diana Esquivel](#); [Amy R. Margolies](#); [Anita K. Clarke](#)
Cc: [Amy R. Margolies](#); [Anita K. Clarke](#); [Mark Meneses](#); [Angelica S. Calderon](#); [Gloria Pence](#); dalekgalipo@yahoo.com; [Santiago Laurel](#)
Subject: RE: Puga v. County of San Bernardino, et al.
Date: Friday, October 18, 2024 4:14:56 PM
Attachments: [image001.jpg](#)

Hang,

First, I disagree with you that this is the County's fault or that these Defendants were somehow responsible for the delay in completing the investigation. The District Attorney operates independently on these issues and the Sheriff's Department had absolutely no control over when the DA would finish its investigation. Also I am not certain how you can possibly claim there was some delay in the County notifying Plaintiff's that the investigation was completed. It was not released by the District Attorney's office until 10/4 (a Friday) of which the District attorney did not advise our office on. In any event, you contacted us one business day later on 10/7 (Mon) to request deposition dates. And I provided you dates almost immediately a mere two days later on 10/9 so where was the delay? We have acted promptly to get YOU the discovery Plaintiff needs well before the DCO of January 2 as have the CHP defendants.

On the other hand, we requested Plaintiff provided dates on October 7 as well. Plaintiff opted not to do so instead assuring us that dates would come. Almost two weeks later having still not received dates, we were forced to send unilateral notices. It was only then we got dates from your office. Even then Plaintiff has claimed NONE of the dates work ONLY because Plaintiff does not want to produce any Plaintiffs until they have been able to complete the five Defendant depositions first. As such minimal dates were offered in December and with respect to the Botten Plaintiffs only two dates were proposed that are a mere two weeks before the cutoff when County Defense counsel is in trial. This is unacceptable. As set forth by Diana we should all be working together to get these depositions done. Instead Plaintiffs, without setting forth any prejudice that will befall them simply refuse to mix the Plaintiff depositions in with the Defendants which is clearly the most expeditious way to complete ALL of the discovery.

As for the County providing dates in November, I did not initially have any availability the last week of October but since I gave you dates my two hearings on October 28 were vacated and the expert deposition I had scheduled the afternoon of October 30 was rescheduled due to a trial continuance that just happened this week I therefore tried to fit three Plaintiff depositions into those slots. It doesn't even matter which Plaintiffs we take on those days if any of them are available.

Respectfully, Plaintiff's wait and see approach will only prejudice Defendants as Plaintiffs will get their depositions shortly as scheduled and then Defendants will be left to scramble in December and likely seek a continuance assuming my December 17 trial goes as scheduled.

This is unacceptable. We would therefore request that you back of the position that Defendants must sit and wait when there are eight separate depositions that need to be scheduled for the Plaintiffs. Or

in the alternative we would request that you stipulate to a thirty day continuance of the discovery cut off only so that we can ensure these depositions are completed.

Alternatively, if Plaintiff persists in the position that no Plaintiffs will be produced until after the Defendants and only on the eve of the current DCO and is likewise unwilling to stipulate to any reasonable continuance in light of this position, then we will move Ex Parte next week to seek earlier dates for Plaintiffs even if it is before Defendants, or in the alternative a thirty day continuance of the discovery cut off.

Shannon L. Gustafson

Shareholder

Direct: (714) 352-3547



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Orange, California 92868

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From: Hang Le <hlee@galipolaw.com>

Sent: Friday, October 18, 2024 2:51 PM

To: Diana Esquivel <Diana.Esquivel@doj.ca.gov>; Shannon Gustafson <sgustafson@lynberg.com>; Amy R. Margolies <amargolies@lynberg.com>; Anita K. Clarke <aclarke@lynberg.com>

Cc: Amy R. Margolies <amargolies@lynberg.com>; Anita K. Clarke <aclarke@lynberg.com>; Mark Meneses <mmeneses@lynberg.com>; Angelica S. Calderon <acalderon@lynberg.com>; Gloria Pence <gpence@lynberg.com>; dalekgalipo@yahoo.com; Santiago Laurel <slaurel@galipolaw.com>

Subject: RE: Puga v. County of San Bernardino, et al.

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Good afternoon Diana,

We still have a month and a half until December and we have yet to know if there will be problems with officer depositions in November. If we are unable to take officer depositions in November (which we believe is unlikely), we are happy to revisit this issue and/or discuss continuing the case management dates then. Until then, we would like to abide by the stipulation all parties willingly

entered into regarding priority of the officer depositions. Thank you.

Best regards,
Hang Le

Hang D. Le, Esq. | Law Offices of Dale K. Galipo | 21800 Burbank Blvd., Suite 310, Woodland Hills, CA 91367 | Office: +1.818.347.3333 | Fax: +1.818.347.4118 | Email: hlee@galipolaw.com

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From: Diana Esquivel <Diana.Esquivel@doj.ca.gov>
Sent: Friday, October 18, 2024 2:41 PM
To: Hang Le <hlee@galipolaw.com>; Shannon Gustafson <sgustafson@lynberg.com>; Amy R. Margolies <amargolies@lynberg.com>; Anita K. Clarke <acl Clarke@lynberg.com>
Cc: Amy R. Margolies <amargolies@lynberg.com>; Anita K. Clarke <acl Clarke@lynberg.com>; Mark Meneses <mmeneses@lynberg.com>; Angelica S. Calderon <acalderon@lynberg.com>; Gloria Pence <gpence@lynberg.com>; dalekgalipo@yahoo.com; Santiago Laurel <slaurel@galipolaw.com>
Subject: RE: Puga v. County of San Bernardino, et al.

Good afternoon Hang,

I share Shannon's concerns regarding delaying taking any Plaintiff's deposition until after all the Defendant officers are deposed, especially when your office isn't even sure if it can proceed with the officers depositions in November due to your trial conflict. Based on your response below, if you're unable to proceed with Blackwood and Rubalcava's depositions on November 4, you will not allow Plaintiffs' depositions to go forward until Blackwood and Rubalcava's depositions are rescheduled and completed. What if their deposition cannot be taken until mid-December due to your schedule? Are you doing to refuse to produce any Plaintiff for deposition until after mid-December? This makes no sense and will cause unnecessary delay in completing the discovery that needs to be done in the time remaining. We need to proceed in an efficient and practical manner that will allow completion of all the discovery that is needed between now and the close of discovery.

Moreover, I don't understand what prejudice Plaintiffs will suffer if any of their depositions are taken before all the officers' depositions are completed. Again, we need to be reasonable and practical. I'd hate to burden the Court with these petty discovery issues that the parties should be able to resolve on their own.

Thanks,

-Diana

Diana Esquivel
Deputy Attorney General
TORT & CONDEMNATION SECTION
Office of the Attorney General
Tel: (916) 210-7320
Fax: (916) 322-8288
Email: Diana.Esquivel@doj.ca.gov

From: Hang Le <hlee@galipolaw.com>
Sent: Friday, October 18, 2024 2:29 PM
To: Shannon Gustafson <sgustafson@lynberg.com>; Amy R. Margolies <amargolies@lynberg.com>; Anita K. Clarke <aclarke@lynberg.com>
Cc: Amy R. Margolies <amargolies@lynberg.com>; Anita K. Clarke <aclarke@lynberg.com>; Mark Meneses <mmeneses@lynberg.com>; Angelica S. Calderon <acalderon@lynberg.com>; Gloria Pence <gpence@lynberg.com>; dalekgalipo@yahoo.com; Diana Esquivel <Diana.Esquivel@doj.ca.gov>; Santiago Laurel <slaurel@galipolaw.com>
Subject: RE: Puga v. County of San Bernardino, et al.

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Shannon,

While I agree that we have limited time left discovery, this was an unfortunate result of the County's delay in concluding the investigation and the lack of communication from County Defendants regarding the conclusion of the investigation. We only agreed to continue the case management deadlines due to the agreement that the officers' depositions would proceed first, given that we had made the effort to secure those depositions first and was only told a few days before the depositions that they could not occur due to the pending investigation. Had there not been that agreement, we would not have agreed to the stipulation and would have opposed any protective order regarding the officers' depositions. Additionally, we were informed at the time of the stipulation that the County anticipated it would conclude its investigation by June at the latest. Despite several follow ups from us, we were not informed that the County had concluded its investigation on September 12, 2024 and only found out about it when the County published its Public Release Memorandum regarding the incident on October 4, 2024. When we reached out for dates, we requested availability for the last week of October and were instead given dates in November. We believe if Defendants take this up with the Court, the Court would enforce the stipulation that the parties freely entered into.

In light of the parties' stipulation, we will not be producing the plaintiffs for October 28.

Additionally, I am currently not available the last two weeks of November. However, things may open up as we get closer. I will let you know if any dates free up.

Best regards,
Hang Le

Hang D. Le, Esq. | Law Offices of Dale K. Galipo | 21800 Burbank Blvd., Suite 310, Woodland Hills, CA 91367 | Office: +1.818.347.3333 | Fax: +1.818.347.4118 | Email: hlee@galipolaw.com

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From: Shannon Gustafson <sgustafson@lynberg.com>
Sent: Friday, October 18, 2024 2:12 PM
To: Hang Le <hlee@galipolaw.com>; Amy R. Margolies <amargolies@lynberg.com>; Anita K. Clarke <aclarke@lynberg.com>
Cc: Amy R. Margolies <amargolies@lynberg.com>; Anita K. Clarke <aclarke@lynberg.com>; Mark Meneses <mmeneses@lynberg.com>; Angelica S. Calderon <acalderon@lynberg.com>; Gloria Pence <gpence@lynberg.com>; dalekgalipo@yahoo.com; Diana Esquivel <Diana.Esquivel@doj.ca.gov>; Santiago Laurel <slaurel@galipolaw.com>
Subject: RE: Puga v. County of San Bernardino, et al.

Hang,

First at the time we reached this stipulation it was based on the premise that none of the officers could be deposed due to the 5th amendment issues and therefore we would delay taking the Plaintiff depositions as a courtesy in return for Plaintiff agreeing to extend the deadline for the officers.

Now that the 5th amendment issues have been resolved and the Defendant depositions have been scheduled it makes little to no sense to force Defendants to wait to take a single Plaintiff deposition until after all the Defendants have been deposed given the limited time left and we think if we were forced to take this up with the Court it would agree.

Further we asked you for dates multiple times and did not receive a single date for a single witness until after we sent you notices.

Are you indicating that you are not available October 28 or are simply refusing to produce a Plaintiff until after the Defendants? As to the November 21 date if you are not available we can work on rescheduling. However, I note that you did not offer a single date in November. Is it your position that not a single witness is available next month and that we have to wait until December or later to

take all of the depositions.

This may pose a problem as I am currently set for a trial on December 17 and may therefore have to request a continuance of the discovery cut off under the circumstances as I cannot be in deposition every single day the week before my trial.

Shannon L. Gustafson
Shareholder
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From: Hang Le <hlee@galipolaw.com>
Sent: Friday, October 18, 2024 1:59 PM
To: Shannon Gustafson <sgustafson@lynberg.com>; Amy R. Margolies <amargolies@lynberg.com>; Anita K. Clarke <aclarke@lynberg.com>
Cc: Shannon Gustafson <sgustafson@lynberg.com>; Amy R. Margolies <amargolies@lynberg.com>; Anita K. Clarke <aclarke@lynberg.com>; Mark Meneses <mmeneses@lynberg.com>; Angelica S. Calderon <acalderon@lynberg.com>; Gloria Pence <gpence@lynberg.com>; dalekgalipo@yahoo.com; Diana.Esquivel@doj.ca.gov; Santiago Laurel <slaurel@galipolaw.com>
Subject: RE: Puga v. County of San Bernardino, et al.

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Dear Counsel,

We are in receipt of your notice of depositions of the Plaintiffs in the Puga v. County of San Bernardino case.

First off, we object to the date of October 28, 2024 for the depositions of Antonia Salas Ubaldo and Maria Cadena. Pursuant to the May 24, 2024 Stipulation (Doc. No. 84), the parties agreed that the deposition of the individual officers would proceed before any other witness or party depositions. Since the officer depositions have been tentatively agreed-upon to occur in November, the noticed date of October 28 is in violation of the parties' agreement.

Second, we are not available November 21 for Jasmine Hernandez and Lydia Lopez's depositions.

Assuming that the involved officers' depositions will have occurred prior to the following dates, the Puga Plaintiffs are available as follows:

Antonia Salas Ubaldo: 12/2-12/6, 12/9-12/13, 12/16-12/20. Please note, Ms. Ubaldo will require a Spanish translator. Additionally, Ms. Ubaldo recently suffered a stroke and now has a hard time speaking, so she may be difficult to understand at times.

Jasmine Hernandez: 12/2-12/6, 12/9-12/13, 12/16-12/20.

Maria Cadena: 12/2-12/6, 12/9-12/13, 12/16-12/20.

Lydia Lopez: 12/2-12/6, 12/9-12/13, 12/16-12/20, but prefers an earlier date and Wednesday or Thursday if possible.

Best regards,
Hang Le

Hang D. Le, Esq. | Law Offices of Dale K. Galipo | 21800 Burbank Blvd., Suite 310, Woodland Hills, CA 91367 | Office: +1.818.347.3333 | Fax: +1.818.347.4118 | Email: hlee@galipolaw.com

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From: Gloria Pence <gpence@lynberg.com>

Sent: Friday, October 18, 2024 12:41 PM

To: dalekgalipo@yahoo.com; Hang Le <hlee@galipolaw.com>; Diana.Esquivel@doj.ca.gov

Cc: Shannon Gustafson <sgustafson@lynberg.com>; Amy R. Margolies <amargolies@lynberg.com>; Anita K. Clarke <acl Clarke@lynberg.com>; Mark Meneses <mmeneses@lynberg.com>; Angelica S. Calderon <acalderon@lynberg.com>

Subject: Puga v. County of San Bernardino, et al.

Counsel, please see the attached.

Kindest,

Gloria Pence
Legal Secretary to
Shannon L. Gustafson
Anita K. Clarke
Amy Margolies

Mark Menses

Off: (714) 937-1010 Fax: (714) 937-1003



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1 Shannon L. Gustafson (SBN228856)
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2 Amy R. Margolies (SBN283471)
Amargolies@lynberg.com

3 Anita K. Clarke (SBN321015)
aclarke@lynberg.com

4 **LYNBERG & WATKINS**

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6 (714) 937-1010 Telephone

(714) 937-1003 Facsimile

7 Attorneys for Defendant, COUNTY OF SAN BERNARDINO,
8 ROBERT VACCARI, and JAKE ADAMS

9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA**

11 L.C., a minor by and through her
12 guardian *ad litem* Maria Cadena,
individually and as successor-in-interest
13 to Hector Puga; I.H., a minor by and
through his guardian *ad litem* Jasmine
14 Hernandez, individually and as
successor-in-interest to Hector Puga;
15 A.L., a minor by and through her
guardian *ad litem* Lydia Lopez,
16 individually and as successor-in-interest
to Hector Puga; and ANTONIA
SALAS UBALDO, individually,

17 Plaintiffs,

18 vs.

19
20 STATE OF CALIFORNIA; COUNTY
OF SAN BERNARDINO; S.S.C., a
21 nominal defendant; ISAAH KEE;
22 MICHAEL BLACKWOOD;
BERNARDO RUBALCAVA;
23 ROBERT VACCARI; JAKE ADAMS;
24 and DOES 6-10, inclusive,

25 Defendants.

CASE NO. 5:22-cv-00949-KK-(SHKx)

Assigned for All Purposes to:
Hon. Kenly K. Kato – Courtroom 1

**NOTICE OF TAKING DEPOSITION
OF ANTONIA SALAS UBALDO**

Date: October 28, 2024
Time: 10:00 a.m.
Dept.: Zoom link attached

Trial Date: 01/13/2025

Complaint filed: 06/07/2022

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1 **PLEASE TAKE NOTICE** that pursuant to the Federal Rules of Civil
2 Procedure Rule 30, counsel for Defendants County of San Bernardino, Robert
3 Vaccari and Jake Adams in the above-captioned matter will take the oral deposition
4 of ANTONIA SALAS UBALDO. This deposition is to take place on **October 28,**
5 **2024 at 10:00 a.m.** via video conference (ZOOM link attached), before a Certified
6 Shorthand Reporter authorized to administer oaths in the State of California.

7 **NOTICE IS FURTHER GIVEN** that we reserve the right to conduct this
8 deposition utilizing a secure web-based deposition service or telephonically only to
9 provide remote access for those parties wishing to participate in the deposition via
10 the internet and/or the telephone.

11 **PLEASE TAKE FURTHER NOTICE** that the court reporter may also be
12 remote via one of the options above for the purposes of reporting the proceeding and
13 may or may not be in the presence of the deponent.

14 **PLEASE TAKE FURTHER NOTICE** that we also reserve the right to
15 utilize instant visual display technology such that the court reporter's writing of the
16 proceeding or pertinent exhibits will be displayed simultaneous to their writing of
17 the same on one's laptop, iPad, tablet, or other type of display device connected to
18 the court reporter.

19 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Federal Rules of
20 Civil Procedure Rule 30, we reserve the right to record the testimony of this
21 deponent by sound and visual videotape technology for the purpose of using it as
22 admissible evidence at a later proceeding, including trial.

23 If the deponent requires an interpreter, it is requested that you advise this
24 office at least five (5) days prior to the deposition of the language and/or dialect.

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1 DATED: October 18, 2024

LYNBERG & WATKINS
A Professional Corporation

2
3
4 By: /s/Shannon L. Gustafson
5 **SHANNON L. GUSTAFSON**
6 **AMY R. MARGOLIES**
7 **ANITA K. CLARKE**
8 Attorneys for Defendant, Defendant
9 **COUNTY OF SAN BERNARDINO**
10 **ROBERT VACCARI, and JAKE ADAMS**
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1100 Town & Country Road, Suite #1450, Orange, California 92868.

On October 18 2024 I served the foregoing document(s) described as **DEFENDANTS' NOTICE OF TAKING DEPOSITION OF ANTONIA SALAS UBALDO** on the interested parties by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

Dale K. Galipo, Esq. Hang D. Le, Esq. LAW OFFICES OF DALE K. GALIPO 21800 Burbank Boulevard, Suite 310 Woodland Hills, California 91367 Tele: (818) 347-3333 Fax: (818) 347-4118 Email: dalekgalipo@yahoo.com Email: hlee@galipolaw.com	Attorney for Plaintiffs, L.C., I.H., A.L., and ANTONIA SALAS UBALDO
--	---

Diana Esquivel Deputy Attorney General TORT & CONDEMNATION SECTION Office of the Attorney General Tel: (916) 210-7320 Fax: (916) 322-8288 Email: Diana.Esquivel@doj.ca.gov	Attorney for Defendants STATE OF CALIFORNIA by and through California Highway Patrol and Michael Blackwood
--	---

☐ **BY E-SERVE:** The above listed document(s) were electronically served via the USDC Central District's CM/ECF system and the Notice of Electronic Filing (NEF) indicates the registered party and/or attorney were served with the above documents.

☒ **BY ELECTRONIC MAIL:** I caused all of the pages of the above-entitled document to be sent to the recipient(s) noted at the respective email address(es) indicated.

☐ **BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand to the office(s) of the addressee via messenger.

I declare under penalty of perjury under the laws of the state of California that the above is true and correct. Executed on October 18, 2024, at Orange, California.

/s/ Gloria Pence
Gloria Pence

1 Shannon L. Gustafson (SBN228856)
sgustafson@lynberg.com

2 Amy R. Margolies (SBN283471)
Amargolies@lynberg.com

3 Anita K. Clarke (SBN321015)
aclarke@lynberg.com

4 **LYNBERG & WATKINS**

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7 Attorneys for Defendant, COUNTY OF SAN BERNARDINO,
8 ROBERT VACCARI, and JAKE ADAMS

9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA**

11 L.C., a minor by and through her
12 guardian *ad litem* Maria Cadena,
individually and as successor-in-interest
13 to Hector Puga; I.H., a minor by and
through his guardian *ad litem* Jasmine
14 Hernandez, individually and as
successor-in-interest to Hector Puga;
15 A.L., a minor by and through her
guardian *ad litem* Lydia Lopez,
individually and as successor-in-interest
16 to Hector Puga; and ANTONIA
SALAS UBALDO, individually,

17 Plaintiffs,

18 vs.

19
20 STATE OF CALIFORNIA; COUNTY
OF SAN BERNARDINO; S.S.C., a
21 nominal defendant; ISAIAH KEE;
22 MICHAEL BLACKWOOD;
BERNARDO RUBALCAVA;
23 ROBERT VACCARI; JAKE ADAMS;
24 and DOES 6-10, inclusive,

25 Defendants.

26 ///

27 ///

CASE NO. 5:22-cv-00949-KK-(SHKx)

*Assigned for All Purposes to:
Hon. Kenly K. Kato – Courtroom 1*

**NOTICE OF TAKING DEPOSITION
OF JASMINE HERNANDEZ as
GUARDIAN AD LITEM OF I.H.**

Date: November 21, 2024
Time: 2:00 p.m.
Dept.: Zoom link attached

Trial Date: 01/13/2025

Complaint filed: 06/07/2022

1 DATED: October 18, 2024

LYNBERG & WATKINS
A Professional Corporation

2
3
4 By: /s/Shannon L. Gustafson

SHANNON L. GUSTAFSON

AMY R. MARGOLIES

ANITA K. CLARKE

Attorneys for Defendant, Defendant

COUNTY OF SAN BERNARDINO

ROBERT VACCARI, and JAKE ADAMS

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1100 Town & Country Road, Suite #1450, Orange, California 92868.

On October 18 2024 I served the foregoing document(s) described as **DEFENDANTS' NOTICE OF TAKING DEPOSITION OF JASMINE HERNANDEZ as GUARDIAN AD LITEM OF I.H.** on the interested parties by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

Dale K. Galipo, Esq. Hang D. Le, Esq. LAW OFFICES OF DALE K. GALIPO 21800 Burbank Boulevard, Suite 310 Woodland Hills, California 91367 Tele: (818) 347-3333 Fax: (818) 347-4118 Email: dalekgalipo@yahoo.com Email: hlee@galipolaw.com	Attorney for Plaintiffs, L.C., I.H., A.L., and ANTONIA SALAS UBALDO
--	---

Diana Esquivel Deputy Attorney General TORT & CONDEMNATION SECTION Office of the Attorney General Tel: (916) 210-7320 Fax: (916) 322-8288 Email: Diana.Esquivel@doj.ca.gov	Attorney for Defendants STATE OF CALIFORNIA by and through California Highway Patrol and Michael Blackwood
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☒ **BY ELECTRONIC MAIL:** I caused all of the pages of the above-entitled document to be sent to the recipient(s) noted at the respective email address(es) indicated.

☐ **BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand to the office(s) of the addressee via messenger.

I declare under penalty of perjury under the laws of the state of California that the above is true and correct. Executed on October 18, 2024 at Orange, California.

/s/ Gloria Pence

Gloria Pence

Shannon L. Gustafson (SBN228856)
sgustafson@lynberg.com

Amy R. Margolies (SBN283471)
Amargolies@lynberg.com

Anita K. Clarke (SBN321015)
aclarke@lynberg.com

LYNBERG & WATKINS
A Professional Corporation
1100 W. Town & Country Road, Suite #1450
Orange, California 92868
(714) 937-1010 Telephone
(714) 937-1003 Facsimile

Attorneys for Defendant, COUNTY OF SAN BERNARDINO,
ROBERT VACCARI, and JAKE ADAMS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

L.C., a minor by and through her
guardian *ad litem* Maria Cadena,
individually and as successor-in-interest
to Hector Puga; I.H., a minor by and
through his guardian *ad litem* Jasmine
Hernandez, individually and as
successor-in-interest to Hector Puga;
A.L., a minor by and through her
guardian *ad litem* Lydia Lopez,
individually and as successor-in-interest
to Hector Puga; and ANTONIA
SALAS UBALDO, individually,

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY
OF SAN BERNARDINO; S.S.C., a
nominal defendant; ISAIAH KEE;
MICHAEL BLACKWOOD;
BERNARDO RUBALCAVA;
ROBERT VACCARI; JAKE ADAMS;
and DOES 6-10, inclusive,

Defendants.

CASE NO. 5:22-cv-00949-KK-(SHKx)

Assigned for All Purposes to:
Hon. Kenly K. Kato – Courtroom 1

**NOTICE OF TAKING DEPOSITION
OF LYDIA LOPEZ GUARDIAN AD
LITEM TO A.L**

Date: October 28, 2024
Time: 2:00 p.m.
Dept.: Zoom link attached

Trial Date: 01/13/2025

Complaint filed: 06/07/2022

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1 **PLEASE TAKE NOTICE** that pursuant to the Federal Rules of Civil
2 Procedure Rule 30, counsel for Defendants County of San Bernardino, Robert
3 Vaccari and Jake Adams in the above-captioned matter will take the oral deposition
4 of LYDIA LOPEZ, GUARDIAN AD LITEM TO A.L. This deposition is to take
5 place on **October 28, 2024 at 2:00 p.m.** via video conference (ZOOM link
6 attached), before a Certified Shorthand Reporter authorized to administer oaths in
7 the State of California.

8 **NOTICE IS FURTHER GIVEN** that we reserve the right to conduct this
9 deposition utilizing a secure web-based deposition service or telephonically only to
10 provide remote access for those parties wishing to participate in the deposition via
11 the internet and/or the telephone.

12 **PLEASE TAKE FURTHER NOTICE** that the court reporter may also be
13 remote via one of the options above for the purposes of reporting the proceeding and
14 may or may not be in the presence of the deponent.

15 **PLEASE TAKE FURTHER NOTICE** that we also reserve the right to
16 utilize instant visual display technology such that the court reporter's writing of the
17 proceeding or pertinent exhibits will be displayed simultaneous to their writing of
18 the same on one's laptop, iPad, tablet, or other type of display device connected to
19 the court reporter.

20 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Federal Rules of
21 Civil Procedure Rule 30, we reserve the right to record the testimony of this
22 deponent by sound and visual videotape technology for the purpose of using it as
23 admissible evidence at a later proceeding, including trial.

24 If the deponent requires an interpreter, it is requested that you advise this
25 office at least five (5) days prior to the deposition of the language and/or dialect.

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1 DATED: October 18, 2024

LYNBERG & WATKINS
A Professional Corporation

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3
4 By: /s/Shannon L. Gustafson
5 **SHANNON L. GUSTAFSON**
6 **AMY R. MARGOLIES**
7 **ANITA K. CLARKE**
8 Attorneys for Defendant, Defendant
9 **COUNTY OF SAN BERNARDINO**
10 **ROBERT VACCARI, and JAKE ADAMS**
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1100 Town & Country Road, Suite #1450, Orange, California 92868.

On October 18 2024 I served the foregoing document(s) described as **DEFENDANTS' NOTICE OF TAKING DEPOSITION OF LYDIA LOPEZ, GUARDIAN AD LITEM TO A.L.** on the interested parties by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

Dale K. Galipo, Esq. Hang D. Le, Esq. LAW OFFICES OF DALE K. GALIPO 21800 Burbank Boulevard, Suite 310 Woodland Hills, California 91367 Tele: (818) 347-3333 Fax: (818) 347-4118 Email: dalekgalipo@yahoo.com Email: hlee@galipolaw.com	Attorney for Plaintiffs, L.C., I.H., A.L., and ANTONIA SALAS UBALDO
--	---

Diana Esquivel Deputy Attorney General TORT & CONDEMNATION SECTION Office of the Attorney General Tel: (916) 210-7320 Fax: (916) 322-8288 Email: Diana.Esquivel@doj.ca.gov	Attorney for Defendants STATE OF CALIFORNIA by and through California Highway Patrol and Michael Blackwood
--	---

☐ **BY E-SERVE:** The above listed document(s) were electronically served via the USDC Central District's CM/ECF system and the Notice of Electronic Filing (NEF) indicates the registered party and/or attorney were served with the above documents.

☒ **BY ELECTRONIC MAIL:** I caused all of the pages of the above-entitled document to be sent to the recipient(s) noted at the respective email address(es) indicated.

☐ **BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand to the office(s) of the addressee via messenger.

I declare under penalty of perjury under the laws of the state of California that the above is true and correct. Executed on October 18, 2024, at Orange, California.

/s/ Gloria Pence
Gloria Pence

Shannon L. Gustafson (SBN228856)
sgustafson@lynberg.com

Amy R. Margolies (SBN283471)
Amargolies@lynberg.com

Anita K. Clarke (SBN321015)
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Attorneys for Defendant, COUNTY OF SAN BERNARDINO,
ROBERT VACCARI, and JAKE ADAMS

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her
guardian *ad litem* Maria Cadena,
individually and as successor-in-interest
to Hector Puga; I.H., a minor by and
through his guardian *ad litem* Jasmine
Hernandez, individually and as
successor-in-interest to Hector Puga;
A.L., a minor by and through her
guardian *ad litem* Lydia Lopez,
individually and as successor-in-interest
to Hector Puga; and ANTONIA
SALAS UBÁLDO, individually,

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY
OF SAN BERNARDINO; S.S.C., a
nominal defendant; ISAAH KEE;
MICHAEL BLACKWOOD;
BERNARDO RUBALCAVA;
ROBERT VACCARI; JAKE ADAMS;
and DOES 6-10, inclusive,

Defendants.

CASE NO. 5:22-cv-00949-KK-(SHKx)

*Assigned for All Purposes to:
Hon. Kenly K. Kato – Courtroom 1*

**NOTICE OF TAKING DEPOSITION
OF MARIA CADENA as
GUARDIAN AD LITEM TO L.C.**

Date: November 21, 2024
Time: 10:00 a.m.
Dept.: Zoom link attached

Trial Date: 01/13/2025

Complaint filed: 06/07/2022

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1 **PLEASE TAKE NOTICE** that pursuant to the Federal Rules of Civil
2 Procedure Rule 30, counsel for Defendants County of San Bernardino, Robert
3 Vaccari and Jake Adams in the above-captioned matter will take the oral deposition
4 of MARIA CADENA as GUARDIAN AD LITEM OF L.C. This deposition is to
5 take place on **November 21, 2024 at 10:00 a.m.** via video conference (ZOOM link
6 attached), before a Certified Shorthand Reporter authorized to administer oaths in
7 the State of California.

8 **NOTICE IS FURTHER GIVEN** that we reserve the right to conduct this
9 deposition utilizing a secure web-based deposition service or telephonically only to
10 provide remote access for those parties wishing to participate in the deposition via
11 the internet and/or the telephone.

12 **PLEASE TAKE FURTHER NOTICE** that the court reporter may also be
13 remote via one of the options above for the purposes of reporting the proceeding and
14 may or may not be in the presence of the deponent.

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16 utilize instant visual display technology such that the court reporter's writing of the
17 proceeding or pertinent exhibits will be displayed simultaneous to their writing of
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19 the court reporter.

20 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Federal Rules of
21 Civil Procedure Rule 30, we reserve the right to record the testimony of this
22 deponent by sound and visual videotape technology for the purpose of using it as
23 admissible evidence at a later proceeding, including trial.

24 If the deponent requires an interpreter, it is requested that you advise this
25 office at least five (5) days prior to the deposition of the language and/or dialect.

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1 DATED: October 18, 2024

LYNBERG & WATKINS
A Professional Corporation

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3
4 By: /s/Shannon L. Gustafson

SHANNON L. GUSTAFSON

AMY R. MARGOLIES

ANITA K. CLARKE

Attorneys for Defendant, Defendant

COUNTY OF SAN BERNARDINO

ROBERT VACCARI, and JAKE ADAMS

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1100 Town & Country Road, Suite #1450, Orange, California 92868.

On October 18 2024 I served the foregoing document(s) described as **DEFENDANTS' NOTICE OF TAKING DEPOSITION OF MARIA CADENA as GUARDIAN AD LITEM OF L.C.** on the interested parties by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

Dale K. Galipo, Esq. Hang D. Le, Esq. LAW OFFICES OF DALE K. GALIPO 21800 Burbank Boulevard, Suite 310 Woodland Hills, California 91367 Tele: (818) 347-3333 Fax: (818) 347-4118 Email: dalekgalipo@yahoo.com Email: hlee@galipolaw.com	Attorney for Plaintiffs, L.C., I.H., A.L., and ANTONIA SALAS UBALDO
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Diana Esquivel Deputy Attorney General TORT & CONDEMNATION SECTION Office of the Attorney General Tel: (916) 210-7320 Fax: (916) 322-8288 Email: Diana.Esquivel@doj.ca.gov	Attorney for Defendants STATE OF CALIFORNIA by and through California Highway Patrol and Michael Blackwood
--	---

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☐ **BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand to the office(s) of the addressee via messenger.

I declare under penalty of perjury under the laws of the state of California that the above is true and correct. Executed on October 18, 2024 at Orange, California.

/s/ Gloria Pence
Gloria Pence

Shannon L. Gustafson (SBN228856)
sgustafson@lynberg.com

Amy R. Margolies (SBN283471)
Amargolies@lynberg.com

Anita K. Clarke (SBN321015)
aclarke@lynberg.com

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Orange, California 92868
(714) 937-1010 Telephone
(714) 937-1003 Facsimile

Attorneys for Defendant, COUNTY OF SAN BERNARDINO,
ROBERT VACCARI, and JAKE ADAMS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

L.C., a minor by and through her
guardian *ad litem* Maria Cadena,
individually and as successor-in-interest
to Hector Puga; I.H., a minor by and
through his guardian *ad litem* Jasmine
Hernandez, individually and as
successor-in-interest to Hector Puga;
A.L., a minor by and through her
guardian *ad litem* Lydia Lopez,
individually and as successor-in-interest
to Hector Puga; and ANTONIA
SALAS UBALDO, individually,

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY
OF SAN BERNARDINO; S.S.C., a
nominal defendant; ISAIAH KEE;
MICHAEL BLACKWOOD;
BERNARDO RUBALCAVA;
ROBERT VACCARI; JAKE ADAMS;
and DOES 6-10, inclusive,

Defendants.

CASE NO. 5:22-cv-00949-KK-(SHKx)

Assigned for All Purposes to:
Hon. Kenly K. Kato – Courtroom 1

**AMENDED NOTICE OF TAKING
DEPOSITION OF ANTONIA SALAS
UBALDO**

Date: December 3, 2024
Time: 10:00 a.m.
Dept.: Zoom link attached

Trial Date: 01/13/2025

Complaint filed: 06/07/2022

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1 **PLEASE TAKE NOTICE** that pursuant to the Federal Rules of Civil
2 Procedure Rule 30, counsel for Defendants County of San Bernardino, Robert
3 Vaccari and Jake Adams in the above-captioned matter will take the oral deposition
4 of ANTONIA SALAS UBALDO. This deposition is to take place on **December 3,**
5 **2024 at 10:00 a.m.** via video conference (ZOOM link attached), before a Certified
6 Shorthand Reporter authorized to administer oaths in the State of California.

7 **NOTICE IS FURTHER GIVEN** that we reserve the right to conduct this
8 deposition utilizing a secure web-based deposition service or telephonically only to
9 provide remote access for those parties wishing to participate in the deposition via
10 the internet and/or the telephone.

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18 the court reporter.

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20 Civil Procedure Rule 30, we reserve the right to record the testimony of this
21 deponent by sound and visual videotape technology for the purpose of using it as
22 admissible evidence at a later proceeding, including trial.

23 If the deponent requires an interpreter, it is requested that you advise this
24 office at least five (5) days prior to the deposition of the language and/or dialect.

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1 DATED: October 21, 2024

LYNBERG & WATKINS
A Professional Corporation

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3
4 By: /s/Shannon L. Gustafson
5 **SHANNON L. GUSTAFSON**
6 **AMY R. MARGOLIES**
7 **ANITA K. CLARKE**
8 Attorneys for Defendant, Defendant
9 COUNTY OF SAN BERNARDINO
10 ROBERT VACCARI, and JAKE ADAMS
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1100 Town & Country Road, Suite #1450, Orange, California 92868.

On October 21 2024 I served the foregoing document(s) described as **DEFENDANTS' AMENDED NOTICE OF TAKING DEPOSITION OF ANTONIA SALAS UBALDO** on the interested parties by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

Dale K. Galipo, Esq. Hang D. Le, Esq. LAW OFFICES OF DALE K. GALIPO 21800 Burbank Boulevard, Suite 310 Woodland Hills, California 91367 Tele: (818) 347-3333 Fax: (818) 347-4118 Email: dalekgalipo@yahoo.com Email: hlee@galipolaw.com	Attorney for Plaintiffs, L.C., I.H., A.L., and ANTONIA SALAS UBALDO
--	---

Diana Esquivel Deputy Attorney General TORT & CONDEMNATION SECTION Office of the Attorney General Tel: (916) 210-7320 Fax: (916) 322-8288 Email: Diana.Esquivel@doj.ca.gov	Attorney for Defendants STATE OF CALIFORNIA by and through California Highway Patrol and Michael Blackwood
--	---

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☐ **BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand to the office(s) of the addressee via messenger.

I declare under penalty of perjury under the laws of the state of California that the above is true and correct. Executed on October 21, 2024, at Orange, California.

/s/ Gloria Pence
Gloria Pence

Shannon L. Gustafson (SBN228856)
sgustafson@lynberg.com

Amy R. Margolies (SBN283471)
Amargolies@lynberg.com

Anita K. Clarke (SBN321015)
aclarke@lynberg.com

LYNBERG & WATKINS

A Professional Corporation
1100 W. Town & Country Road, Suite #1450
Orange, California 92868
(714) 937-1010 Telephone
(714) 937-1003 Facsimile

Attorneys for Defendant, COUNTY OF SAN BERNARDINO,
ROBERT VACCARI, and JAKE ADAMS

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her
guardian *ad litem* Maria Cadena,
individually and as successor-in-interest
to Hector Puga; I.H., a minor by and
through his guardian *ad litem* Jasmine
Hernandez, individually and as
successor-in-interest to Hector Puga;
A.L., a minor by and through her
guardian *ad litem* Lydia Lopez,
individually and as successor-in-interest
to Hector Puga; and ANTONIA
SALAS UBALDO, individually,

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY
OF SAN BERNARDINO; S.S.C., a
nominal defendant; ISAIAH KEE;
MICHAEL BLACKWOOD;
BERNARDO RUBALCAVA;
ROBERT VACCARI; JAKE ADAMS;
and DOES 6-10, inclusive,

Defendants.

CASE NO. 5:22-cv-00949-KK-(SHKx)

*Assigned for All Purposes to:
Hon. Kenly K. Kato – Courtroom 1*

**AMENDED NOTICE OF TAKING
DEPOSITION OF JASMINE
HERNANDEZ as GUARDIAN AD
LITEM OF I.H.**

Date: December 3, 2024
Time: 2:00 p.m.
Dept.: Zoom link attached

Trial Date: 01/13/2025

Complaint filed: 06/07/2022

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PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil Procedure Rule 30, counsel for Defendants County of San Bernardino, Robert Vaccari and Jake Adams in the above-captioned matter will take the oral deposition of JASMINE HERNANDEZ as GUARDIAN AD LITEM OF I.H. This deposition is to take place on **December 3, 2024 at 2:00 P.M.** via video conference (ZOOM link attached), before a Certified Shorthand Reporter authorized to administer oaths in the State of California.

NOTICE IS FURTHER GIVEN that we reserve the right to conduct this deposition utilizing a secure web-based deposition service or telephonically only to provide remote access for those parties wishing to participate in the deposition via the internet and/or the telephone.

PLEASE TAKE FURTHER NOTICE that the court reporter may also be remote via one of the options above for the purposes of reporting the proceeding and may or may not be in the presence of the deponent.

PLEASE TAKE FURTHER NOTICE that we also reserve the right to utilize instant visual display technology such that the court reporter's writing of the proceeding or pertinent exhibits will be displayed simultaneous to their writing of the same on one's laptop, iPad, tablet, or other type of display device connected to the court reporter.

PLEASE TAKE FURTHER NOTICE that, pursuant to Federal Rules of Civil Procedure Rule 30, we reserve the right to record the testimony of this deponent by sound and visual videotape technology for the purpose of using it as admissible evidence at a later proceeding, including trial.

If the deponent requires an interpreter, it is requested that you advise this office at least five (5) days prior to the deposition of the language and/or dialect.

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1 DATED: October 21, 2024

LYNBERG & WATKINS
A Professional Corporation

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4 By: /s/Shannon L. Gustafson
5 **SHANNON L. GUSTAFSON**
6 **AMY R. MARGOLIES**
7 **ANITA K. CLARKE**
8 Attorneys for Defendant, Defendant
9 COUNTY OF SAN BERNARDINO
10 ROBERT VACCARI, and JAKE ADAMS
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1100 Town & Country Road, Suite #1450, Orange, California 92868.

On October 21 2024 I served the foregoing document(s) described as **DEFENDANTS' AMENDED NOTICE OF TAKING DEPOSITION OF JASMINE HERNANDEZ as GUARDIAN AD LITEM OF I.H.** on the interested parties by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

Dale K. Galipo, Esq. Hang D. Le, Esq. LAW OFFICES OF DALE K. GALIPO 21800 Burbank Boulevard, Suite 310 Woodland Hills, California 91367 Tele: (818) 347-3333 Fax: (818) 347-4118 Email: dalekgalipo@yahoo.com Email: hlee@galipolaw.com	Attorney for Plaintiffs, L.C., I.H., A.L., and ANTONIA SALAS UBALDO
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Diana Esquivel Deputy Attorney General TORT & CONDEMNATION SECTION Office of the Attorney General Tel: (916) 210-7320 Fax: (916) 322-8288 Email: Diana.Esquivel@doj.ca.gov	Attorney for Defendants STATE OF CALIFORNIA by and through California Highway Patrol and Michael Blackwood
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BY ELECTRONIC MAIL: I caused all of the pages of the above-entitled document to be sent to the recipient(s) noted at the respective email address(es) indicated.

I declare under penalty of perjury under the laws of the state of California that the above is true and correct. Executed on October 21, 2024 at Orange, California.

/s/ Gloria Pence
Gloria Pence

Shannon L. Gustafson (SBN228856)
sgustafson@lynberg.com

Amy R. Margolies (SBN283471)
Amargolies@lynberg.com

Anita K. Clarke (SBN321015)
aclarke@lynberg.com

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(714) 937-1003 Facsimile

Attorneys for Defendant, COUNTY OF SAN BERNARDINO,
ROBERT VACCARI, and JAKE ADAMS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

L.C., a minor by and through her
guardian *ad litem* Maria Cadena,
individually and as successor-in-interest
to Hector Puga; I.H., a minor by and
through his guardian *ad litem* Jasmine
Hernandez, individually and as
successor-in-interest to Hector Puga;
A.L., a minor by and through her
guardian *ad litem* Lydia Lopez,
individually and as successor-in-interest
to Hector Puga; and ANTONIA
SALAS UBALDO, individually,

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY
OF SAN BERNARDINO; S.S.C., a
nominal defendant; ISAAH KEE;
MICHAEL BLACKWOOD;
BERNARDO RUBALCAVA;
ROBERT VACCARI; JAKE ADAMS;
and DOES 6-10, inclusive,

Defendants.

CASE NO. 5:22-cv-00949-KK-(SHKx)

Assigned for All Purposes to:
Hon. Kenly K. Kato – Courtroom 1

**AMENDED NOTICE OF TAKING
DEPOSITION OF LYDIA LOPEZ
GUARDIAN AD LITEM TO A.L**

Date: December 4, 2024
Time: 2:00 p.m.
Dept.: Zoom link attached

Trial Date: 01/13/2025

Complaint filed: 06/07/2022

1 **PLEASE TAKE NOTICE** that pursuant to the Federal Rules of Civil
2 Procedure Rule 30, counsel for Defendants County of San Bernardino, Robert
3 Vaccari and Jake Adams in the above-captioned matter will take the oral deposition
4 of LYDIA LOPEZ, GUARDIAN AD LITEM TO A.L. This deposition is to take
5 place on **December 4, 2024 at 2:00 p.m.** via video conference (ZOOM link
6 attached), before a Certified Shorthand Reporter authorized to administer oaths in
7 the State of California.

8 **NOTICE IS FURTHER GIVEN** that we reserve the right to conduct this
9 deposition utilizing a secure web-based deposition service or telephonically only to
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24 If the deponent requires an interpreter, it is requested that you advise this
25 office at least five (5) days prior to the deposition of the language and/or dialect.

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1 DATED: October 21, 2024

LYNBERG & WATKINS
A Professional Corporation

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4 By: /s/Shannon L. Gustafson
5 **SHANNON L. GUSTAFSON**
6 **AMY R. MARGOLIES**
7 **ANITA K. CLARKE**
8 Attorneys for Defendant, Defendant
9 COUNTY OF SAN BERNARDINO
10 ROBERT VACCARI, and JAKE ADAMS
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1100 Town & Country Road, Suite #1450, Orange, California 92868.

On October 21 2024 I served the foregoing document(s) described as **DEFENDANTS' AMENDED NOTICE OF TAKING DEPOSITION OF LYDIA LOPEZ, GUARDIAN AD LITEM TO A.L.** on the interested parties by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

Dale K. Galipo, Esq. Hang D. Le, Esq. LAW OFFICES OF DALE K. GALIPO 21800 Burbank Boulevard, Suite 310 Woodland Hills, California 91367 Tele: (818) 347-3333 Fax: (818) 347-4118 Email: dalekgalipo@yahoo.com Email: hlee@galipolaw.com	Attorney for Plaintiffs, L.C., I.H., A.L., and ANTONIA SALAS UBALDO
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Diana Esquivel Deputy Attorney General TORT & CONDEMNATION SECTION Office of the Attorney General Tel: (916) 210-7320 Fax: (916) 322-8288 Email: Diana.Esquivel@doj.ca.gov	Attorney for Defendants STATE OF CALIFORNIA by and through California Highway Patrol and Michael Blackwood
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☐ **BY E-SERVE:** The above listed document(s) were electronically served via the USDC Central District's CM/ECF system and the Notice of Electronic Filing (NEF) indicates the registered party and/or attorney were served with the above documents.

☒ **BY ELECTRONIC MAIL:** I caused all of the pages of the above-entitled document to be sent to the recipient(s) noted at the respective email address(es) indicated.

☐ **BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand to the office(s) of the addressee via messenger.

I declare under penalty of perjury under the laws of the state of California that the above is true and correct. Executed on October 21, 2024, at Orange, California.

/s/ Gloria Pence
Gloria Pence

1 Shannon L. Gustafson (SBN228856)
sgustafson@lynberg.com

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Amargolies@lynberg.com

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4 **LYNBERG & WATKINS**
A Professional Corporation
5 1100 W. Town & Country Road, Suite #1450
Orange, California 92868
6 (714) 937-1010 Telephone
(714) 937-1003 Facsimile

7 Attorneys for Defendant, COUNTY OF SAN BERNARDINO,
8 ROBERT VACCARI, and JAKE ADAMS

9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 L.C., a minor by and through her
12 guardian *ad litem* Maria Cadena,
individually and as successor-in-interest
13 to Hector Puga; I.H., a minor by and
through his guardian *ad litem* Jasmine
14 Hernandez, individually and as
successor-in-interest to Hector Puga;
15 A.L., a minor by and through her
guardian *ad litem* Lydia Lopez,
individually and as successor-in-interest
16 to Hector Puga; and ANTONIA
SALAS UBALDO, individually,

17 Plaintiffs,

18 vs.
19

20 STATE OF CALIFORNIA; COUNTY
OF SAN BERNARDINO; S.S.C., a
21 nominal defendant; ISAIAH KEE;
22 MICHAEL BLACKWOOD;
BERNARDO RUBALCAVA;
23 ROBERT VACCARI; JAKE ADAMS;
24 and DOES 6-10, inclusive,

25 Defendants.
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CASE NO. 5:22-cv-00949-KK-(SHKx)

Assigned for All Purposes to:
Hon. Kenly K. Kato – Courtroom 1

**AMENDED NOTICE OF TAKING
DEPOSITION OF MARIA CADENA
as GUARDIAN AD LITEM TO L.C.**

Date: December 4, 2024
Time: 10:00 a.m.
Dept.: Zoom link attached

Trial Date: 01/13/2025

Complaint filed: 06/07/2022

1 **PLEASE TAKE NOTICE** that pursuant to the Federal Rules of Civil
2 Procedure Rule 30, counsel for Defendants County of San Bernardino, Robert
3 Vaccari and Jake Adams in the above-captioned matter will take the oral deposition
4 of MARIA CADENA as GUARDIAN AD LITEM OF L.C. This deposition is to
5 take place on **December 4, 2024 at 10:00 a.m.** via video conference (ZOOM link
6 attached), before a Certified Shorthand Reporter authorized to administer oaths in
7 the State of California.

8 **NOTICE IS FURTHER GIVEN** that we reserve the right to conduct this
9 deposition utilizing a secure web-based deposition service or telephonically only to
10 provide remote access for those parties wishing to participate in the deposition via
11 the internet and/or the telephone.

12 **PLEASE TAKE FURTHER NOTICE** that the court reporter may also be
13 remote via one of the options above for the purposes of reporting the proceeding and
14 may or may not be in the presence of the deponent.

15 **PLEASE TAKE FURTHER NOTICE** that we also reserve the right to
16 utilize instant visual display technology such that the court reporter's writing of the
17 proceeding or pertinent exhibits will be displayed simultaneous to their writing of
18 the same on one's laptop, iPad, tablet, or other type of display device connected to
19 the court reporter.

20 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Federal Rules of
21 Civil Procedure Rule 30, we reserve the right to record the testimony of this
22 deponent by sound and visual videotape technology for the purpose of using it as
23 admissible evidence at a later proceeding, including trial.

24 If the deponent requires an interpreter, it is requested that you advise this
25 office at least five (5) days prior to the deposition of the language and/or dialect.

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27 ///

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1 DATED: October 21, 2024

LYNBERG & WATKINS
A Professional Corporation

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3
4 By: /s/Shannon L. Gustafson
5 **SHANNON L. GUSTAFSON**
6 **AMY R. MARGOLIES**
7 **ANITA K. CLARKE**
Attorneys for Defendant, Defendant
COUNTY OF SAN BERNARDINO
ROBERT VACCARI, and JAKE ADAMS
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1100 Town & Country Road, Suite #1450, Orange, California 92868.

On October 18 2024 I served the foregoing document(s) described as **DEFENDANTS' AMENDED NOTICE OF TAKING DEPOSITION OF MARIA CADENA as GUARDIAN AD LITEM OF L.C.** on the interested parties by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

Dale K. Galipo, Esq. Hang D. Le, Esq. LAW OFFICES OF DALE K. GALIPO 21800 Burbank Boulevard, Suite 310 Woodland Hills, California 91367 Tele: (818) 347-3333 Fax: (818) 347-4118 Email: dalekgalipo@yahoo.com Email: hlee@galipolaw.com	Attorney for Plaintiffs, L.C., I.H., A.L., and ANTONIA SALAS UBALDO
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Diana Esquivel Deputy Attorney General TORT & CONDEMNATION SECTION Office of the Attorney General Tel: (916) 210-7320 Fax: (916) 322-8288 Email: Diana.Esquivel@doj.ca.gov	Attorney for Defendants STATE OF CALIFORNIA by and through California Highway Patrol and Michael Blackwood
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I declare under penalty of perjury under the laws of the state of California that the above is true and correct. Executed on October 21, 2024 at Orange, California.

/s/ Gloria Pence
Gloria Pence